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January 31, 2025

Via ECF

Hon. Robert W. Lehrburger, U.S. Magistrate Judge
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl St.
New York, NY 10007-1312

Granted.

SO ORDERED:

1/31/2025

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE

Re: Napolitano v. Comm'r of Soc. Sec.
Docket No.: 1:24-CV-8700-JGK-RWL

Dear Magistrate Judge Lehrburger:

I represent the plaintiff, Erica Napolitano, in the above referenced matter seeking review of the Commissioner's denial of Social Security benefits. Heetano Shamsoundar from the Office of General Counsel represents the Commissioner.

I write pursuant to Southern District Standing Order M 10-468 to request an extension of the briefing schedule which would result in the following changes:

	<u>Current Date</u>	<u>New Deadline</u>
Plaintiff to Serve Motion	February 15, 2025	<i>April 7, 2025</i>
Defendant to Serve Response	March 17, 2025	<i>June 9, 2025</i>
Plaintiff to Serve Reply	March 31, 2025	<i>June 30, 2025</i>

I make this request because intervening deadlines on other cases have prevented me from working on this motion. Additionally, I am in the process of moving my office to a new building, and I will be out of town from February 11, through February 20, 2025. As a result, there is no way that I can meet the current deadline. These dates were selected to (hopefully) prevent future scheduling conflicts.

I have conferred with Mr. Shamsoundar, and we have both agreed to these dates. There have been no prior adjournments of any of these deadlines.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,
THE DEHAAN LAW FIRM P.C.

By: /s/ John W. DeHaan
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cc: Heetano Shamsoundar, OGC (Via ECF)